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UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

IN RE: Bard IVC Filters Products
Liability Litigation,

No. 2:15-MD-02641-DGC

**THE PARTIES' JOINT REPORT
CONCERNING PROFILE
FORMS**

1 In a September 4, 2019 amended report regarding the settlement status of
2 cases (Doc. 20061), the parties identified multiple cases that are ripe for transfer.
3 The submission identified the cases from that list in which a properly completed
4 profile form (“PPF”) had not been served. Thereafter, in an order dated September
5 4, 2019, the Court gave those Plaintiffs until September 24, 2019 to provide a PPF
6 to Defendants and stated that the PPF “shall include the place of filter implant.” (Doc.
7 20115.) The Court further ordered the parties to file a status report by September
8 26, 2019 indicating whether a proper PPF has been provided in each such case and
9 noting that the Court “may dismiss any case in which no proper PPF has been
10 provided.”

11 In accordance with the Court’s Order, the parties have attached Exhibit “A,”
12 which is a list of the status of the previously identified cases where a proper PPF had
13 not yet been served. For those 13 cases for which it is indicated that a PPF has been
14 served, Defendants have acknowledged receipt of the PPFs and have stated to
15 Plaintiffs that Defendants do not have any issues with these PPFs.

16 At this time there are four cases in which a proper PPF has not been
17 submitted—*Sattizahn v. C.R. Bard, et al.*, *Fiset v. C.R. Bard, et al.*, *Williams v.*
18 *C.R. Bard, et al.*, and *Barr v. C.R. Bard, et al.*

19 Plaintiffs Sattizahn and Fiset. Plaintiffs’ counsel has indicated that, after
20 months of attempts to communicate with Plaintiffs Beth Sattizahn and David Allen
21 Fiset, Plaintiffs’ counsel discovered that each of these Plaintiffs has recently
22 deceased. Despite efforts to identify and elicit representatives to continue the
23 underlying claims, such efforts failed. The parties have agreed to stipulate to the
24 dismissal of these claims without prejudice. The parties will file such stipulations
25 shortly.

1 Request to Extend Deadline for Plaintiff Williams. Plaintiffs' counsel
2 petitions the court to extend the deadline for Edward Richardson Williams to serve
3 his PPF to October 11. Plaintiffs' counsel communicated with Mr. Williams on or
4 about May 20, 2019, and sent him a form of PPF to complete and return;
5 unfortunately, after May 20, Mr. Williams was unable to communicate with counsel
6 due to the inability to obtain a mobile telephone or a long-term housing
7 arrangements. Additionally, after re-establishing contact with Mr. Williams, counsel
8 learned that Mr. Williams' mother has recently passed away and he is dealing with
9 the loss and her estate. Plaintiff requests this brief extension to grieve his mother's
10 passing. Defendants do not oppose this request for extension.

11 Plaintiff John C. Barr. The Dalimonte Rueb Stoller firm filed a complaint for
12 Mr. Barr as local counsel for the Heard Law Firm with the understanding that the
13 latter firm would be applying to appear *pro hac vice* in the case. The Dalimonte
14 Rueb Stoller firm does not have direct contact with Plaintiff Barr or any of his
15 medical records or files and, thus, is not able to cure the PPF delinquency. Plaintiffs'
16 counsel understands that the Heard Firm has reached out to counsel for Defendants,
17 is serving a complete PPF today, and is applying to appear *pro hac vice* and filing a
18 motion for extension of time to serve the Barr PPF.

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Respectfully submitted, this 27th day of September, 2019.

BEUS GILBERT MCGRODER
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CERTIFICATE OF SERVICE

I hereby certify that on September 27, 2019, the foregoing was electronically
filed with the Clerk of Court using the CM/ECF system which will automatically
send email notification of such filing to all attorneys of record.

/s/ Jessica Gallentine